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*California Indian Heritage Council*

October 30, 2009

Mr. Paul Dabbs and Mr. Kamyar Guivetchi  
Water Resources Evaluation Section  
Statewide Water Planning Branch  
California Department of Water Resources  
PO Box 942836  
Sacramento, CA 94236-0001

RE: CA WATER PLAN PRE-FINAL DRAFT, *HIGHLIGHTS*

Dear Mr. Dabbs and Mr. Guivetchi,

It is the recommendation of the Advisory Committee's Environmental Water Caucus and Environmental Justice Caucus members that the following be changed in the Pre-Final draft and in the final draft of the California Water Plan Update 2009. These comments are considered "red flag issues" by our caucus groups and warrant the Department of Water Resources' (DWR) immediate attention.

RESOURCE MANAGEMENT STRATEGIES: A RANGE OF CHOICES (PAGES 18 & 19)

The current version of the Resource Management Strategies (RMS) is undecipherable to decision makers and water planners and incorrectly portrays the true potential of the strategies; thus steering investments towards the least effective and most expensive strategies (monetarily and environmentally). It is our recommendation that the RMS graphic be reflective of the accompanied text in Volume 2 and/or be amended to include all potential benefits.

For example according to the current graphic, "Urban Water Use Efficiency" does not have the potential benefit of reducing groundwater overdraft. A groundwater dependent

community's best near term action to reduce groundwater overdraft is obviously conservation and the RMS must reflect that "potential benefit." In addition, the supporting text in Volume 2, chapter 3 page 1 also states that water use efficiency is a means to reduce groundwater overdraft. The "Reduce GW Overdraft" icon was not included in Urban Water Use Efficiency strategy and needs it be amended for its inclusion.

Additional amendments to the icons in this section:

I. URBAN WATER USE EFFICIENCY – include the Reduce GW Overdraft icon

The Resource Management Strategy text also supports the inclusion of the icon (Vol. 2, pg. 3-1).

II. DESALINATION – BRACKISH & SEAWATER - remove Environmental Benefits icon

There can be an environmental benefit to desalting brackish water; however there is no primary environmental benefit to desalting seawater. The large intake pipes suck in and kill by catch and the condensed salty brine is later dumped back into the ocean. Not to mention the greenhouse gas emissions associated with the high energy demand of desalinating water. Currently the revised text is not on the website, so it is unclear if it is in Volume 2, Chapter 9. Either way it must be changed or split up the desalination RMS into two categories.

III. RECYCLED MUNICIPAL WATER – include Improved Drought Preparedness, Environmental Benefits and Reduce GW Overdraft icons

The text in Volume 2 supports in inclusion of both Improved Drought Preparedness and Environmental Benefits (pg. 11-1).

The current use of recycled municipal water, as stated in the RMS, is directly associated with both reducing reliance and to replenish groundwater; both are considered methods to reduce groundwater overdraft. According to the RMS text, of the 500,000 AF/yr of recycled water 14% goes to groundwater recharge and 46% is used for agricultural irrigation (Vol.2, pg 11-4); thus warranting the inclusion of the "Reduce GW Overdraft icon" in the list of potential benefits.

IV. SURFACE STORAGE - CALFED - remove Environmental Benefits icon

Arguably there is no net environmental benefit associated with surface storage. This is misleading and obscures the green house gas emissions and the loss of habitat in the construction of a dam.

V. SURFACE STORAGE – REGIONAL/ LOCAL - remove Environmental Benefits icon

Arguably there is no net environmental benefit associated with surface storage. This is misleading and obscures the green house gas emissions and the loss of habitat in the construction of a dam.

- VI. CHANGE ACCUMULATED COSTS BY 2030 TO COST PER ACRE FOOT
- VII. INCLUDE 2005 WATER PLAN UPDATE THE BAR CHART TITLED "RANGE OF ADDITIONAL ANNUAL WATER FOR EIGHT RESOURCE MANAGEMENT CHOICES"

We appreciate the opportunity to provide comments. We look forward to seeing the amendments in the next draft of the Water Plan. If you have any questions please do not hesitate to contact us.

Sincerely,



Evon Chambers, AC Enviro. Caucus Chair  
Water Policy & Planning Analyst  
Planning and Conservation League



Jim Metropulos, Senior Advocate  
Sierra Club California



Steve Evans, Conservation Director  
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